

Exhibit A

Date and Volume of Government Pre-Plea Productions¹

DATE	VOLUME ²	VOLUME IN GI-GABYTES
6/17/2019	3.4 GB	3.40 GB
6/24/2019	1.6 TB*	1600.00 GB
6/28/2019	2.14 TB*	2140.00 GB
7/3/2019	4.44 GB	4.44 GB
8/15/2019	110 GB*	110.00 GB
9/18/2019	39.4 GB*	39.40 GB
Total:	3.897 TB	3897.24 GB

Date and Volume of Government Post-Plea Productions

DATE	VOLUME	VOLUME IN GI-GABYTES
6/19/2020	93 KB	.000 GB
7/2/2020	2.83 GB	2.830 GB
7/14/2020	126.8 MB	.127 GB
7/16/2020	308 KB	.000 GB
7/22/2020	42.27 MB	.042 GB
7/24/2020	13.38 MB	.013 GB
8/11/2020	13.32 MB	.013 GB
8/30/2020	82.80 MB	.828 GB
9/8/2020	1.05 MB	.001 GB
9/9/2020	457.50 GB	457.500 GB

¹ “Date” in both tables specifies the date Mr. Mones received the government’s production. The exception is the last post-plea government production. As set forth in Mr. Mones motion, October 25, 2020 is the date the government delivered a hard drive to Mr. Mones’ counsel, but in that instance, Mr. Mones does not consider the production received, because the government produced “images” of computers and drives without taking the step of extracting from those images reviewable data (a process that takes weeks). In all other post-plea productions, production contents were reviewable upon receipt.

² Volumes marked with an asterisk are the volume of “compressed” data; absent compression the figure would be higher. Volume includes (1) documents, (2) photographs, (3) recordings, and (4) forensic images of electronic devices, including user-generated files and non-user generated data, like operating systems, program files, and unused space.

9/21/2020	1.82 MB	.002 GB
10/6/2020	45.92 MB	.046 GB
10/9/2020	1.37 GB	1.370 GB
10/16/2020	137 MB	.137 GB
10/23/2020	1.56 GB	1.560 GB
10/25/2020	5.8 TB*	5773 GB
<u>Total:</u>	6.23 TB	6237.33 GB